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Specially Appearing Attorneys for Honorable
John K. Trotter (Ret.)

UNITED STATES BANKRUPTCY COURT FOR THE
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re

PG&E CORPORATION,

And

PACIFIC GAS AND ELECTRIC COMPANY,

Debtors,

- ☐ Affects PG&E Corporation
☐ Affects Pacific Gas & Electric Company
☐ Affects both Debtors

**All papers shall be filed in the lead case,
No. 19-3008 (DM)*

Bankr. Case No. 19-3008 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**DECLARATION OF JOHN K. TROTTER
IN RESPONSE TO COURT'S
MEMORANDUM DECISION (DOCKET
NO. 13105) ON MOTION OF WILLIAM B.
ABRAMS**

[RELATES TO DOCKET NO. 12766]

HEARING TO BE DETERMINED BY COURT

I, John K. Trotter, hereby declare under penalty of perjury that the following is true to the
best of my knowledge, information, and belief:

1. I am the retired former Trustee of the PG&E Fire Victim Trust. Unless otherwise
stated in this Declaration, I have knowledge of the facts set forth herein and, if called as a witness, I
would testify to those facts.

1 2. In accordance with the directives of the Memorandum Decision, Docket No. 13105, I
2 hereby attest to the truthfulness of the facts attributed to me in the Response that I submitted to this
3 Court, through counsel—Docket No. 13039. I reviewed that Response before it was filed and
4 approved it for filing.

5 3. I have reviewed the Court’s Memorandum Decision, Docket No. 13105, and below, I
6 answer the questions that the Court posed to me to the best of my personal knowledge:

7
8 a. *Court’s Question 1:* “Within the ‘Notice of Filing of Transcript of Status of Trust
9 Distribution Video Presentation by Justice John Trotter (Ret.), Trustee of the PG&E Fire
10 Victim Trust,’ May 17, 2021 (Dkt. 10654), you indicated that you were employed by certain
11 parties on a part-time basis perhaps as early as April as an advisor. State the dates you signed
12 any employment contracts or were otherwise engaged by any party in connection with the
13 PG&E case.”

14
15 *My Answer:* At the request of the Official Committee of Tort Claimants (“TCC”), I
16 began doing substantive work providing assistance and advice regarding the formulation of
17 claims resolution procedures for the contemplated Trust shortly before January 13, 2020. In
18 an application filed with this Court as Docket No. 5726, the TCC subsequently requested my
19 retention for that work be approved *nunc pro tunc* to January 13, 2020. After the TCC filed a
20 supplement to its application on April 13, 2020 (Docket No. 6746), the Court approved that
21 application.

22
23 b. *Court’s Question 2.* “In reference to Dkt. 10654 in Question 1, state the date that your
24 contract or employment as an advisor was terminated.”

25
26
27
28 No.: 19-3008 DM

DECLARATION OF JOHN K. TROTTER

1 *My Answer:* My employment as an advisor terminated on the effective date of the
2 Trust (see Docket No. 5726 at p. 8 ¶ 17), July 1, 2020, at which point I officially assumed the
3 role of Trustee to the Fire Victim's Trust.
4

5 I declare under penalty of perjury, as set forth in 28 U.S.C. § 1746, that the foregoing is true
and correct to the best of my knowledge, information and belief.

Executed this 27th Day of October in Newport Beach, California.



John K. Trotter